

Minutes  
Meeting of the State Gaming Commission  
July 13, 2006

**Attendance**

A meeting of the State Gaming Commission with representation from the Gaming Advisory Board and Office of Attorney General was held at 1:00 – 5:00 p.m., on July 13, 2006, in the Ft. Totten Room of the State Capitol in Bismarck. Representing the Commission were Chairman James Wang, Ms. Lois Altenburg, Ms. Sandi Frenzel, Mr. Charles Axtman, and Mr. Blake Krabseth who joined the meeting at about 1:15 pm. Representing the Advisory Board were Chairperson Kathy Meagher, Mr. Rick Stenseth, Mr. Pete Ressler, Ms. Traci LaDouceur, Mr. John Klava, Ms. Sharon Weber, Ms. Deb Vaagen, Ms. Char Schaefer, Mr. Ken Lien, Mr. Ron Voller, Mr. Bill Garrett, Ms. Terri Leier-Sprenger, Ms. Vicki Wagner, Mr. Brian Hill, and Mr. Ben Clapp. Representing the office was Mr. Keith Lauer.

The Office of Attorney General notified members of the Gaming Commission and Advisory Board of the meeting through a June 26, 2006, memo. A copy of this notification is attached. The office filed a "Notice of Meeting" with the North Dakota Secretary of State on June 26, 2006.

**Meeting Called to Order**

Chairman Wang called the meeting to order at approximately 1:10 pm.

**Approval of Minutes**

A copy of the November 9, 2005, State Gaming Commission meeting minutes were mailed to the Commission members on June 26, 2006. Commissioner Axtman moved to approve the minutes. Commissioner Altenburg seconded the motion. The motion passed 4-0.

**Public Comments on the Administrative Rule**

Chairman Wang asked Mr. Lauer to begin the discussion by reviewing the public comments on the administrative rules sent to the Commission and Advisory Board members. Mr. Blake Krabseth joined the meeting at this time. Mr. Lauer directed the Commission and Advisory Board members to a document entitled "Public Comments on Proposed Gaming Rules" dated July 13, 2006. The following 21 items were discussed:

**Should the Commission Implement Additional Restrictions on a Lessor's Employees?**

Item 1 - NDAC 99-01.3-02-05(3) & 99-01.3-02-11

This comment was presented in a question format with a bar owner's brother (who is also the bar manager) performing a number of independent contractor services on behalf of an organization. This appears to be an isolated situation. Commissioner Frenzel asked who brought up the comment. Ms. Sharon Weber (Grand Forks Blue Line Club) indicated that this has previously been a problem with her organization with a conflict of interest. She was looking for some clarification in the rules. Commissioners asked a number of questions regarding this situation. After discussion the Commission decided that no rules change was necessary. The Office of Attorney General will work with this organization and attempt to resolve the situation without a change in the present rules.

Requested that Organizations be Allowed to Accept Debit Cards in Addition to Cash & Checks  
Item 2 - NDAC 99-01.3-02-08(1)

Chairman Wang indicated that he believes that the industry has spoken regarding the use of debit cards. He asked if the Office of Attorney General had a problem with this change. Mr. Lauer noted that currently the lottery accepts debit cards and provided that credit cards were not allowed the office did not see a problem. Commission Krabseth moved that debit cards be allowed and Commission Axtman seconded the motion. The motion passed 5-0.

Should the Reference to Security Company be changed Back to Security Agency?  
Item 3 – NDAC 99-01.3-02-11(8)

Based on an additional comment (number 19) which relates to a similar change Commission Frenzel moved and Chairman Wang seconded that discussion on this item be deferred until later in the meeting. The motion passed 5-0.

Request for Change in Rules Related to an Organization's System of Internal Controls  
Item 4 – NDAC 99-01.3-03-01(2)

Mr. Lauer provided an e-mail letter from Mr. Tom Newberger requesting changes that supersede his original request for a change to the administrative rules related to an organization's system of internal control. Reference to Generally Accepted Accounting Principles is no longer requested, however, he still desires to remove language regarding an inadequate system of internal controls. A copy of Senate Bill No. 2384 and Mr. Newberger's testimony at the legislative hearing for this bill were provided to the Commissioners. Mr. Lauer indicated that the CGAND Board through its public comments agrees with the current changes in the administrative rules. The Office of Attorney General has also agreed to use Management Letters along with our compliance audits to address weaknesses in internal controls that are not law or rule violations. Considerable discussion followed on this topic. The Commission after hearing the discussion decided to leave the amended language as drafted.

Request that Reconciliations of Inventories/Master Records be Conducted on an Annual Basis  
Item 5 – NDAC 99-01.3-03-09(1)-(5)

Mr. Lauer pointed out that many smaller organizations are not complying with the current requirement for quarterly reconciliations which will be addressed in organization training. Therefore, the Office of Attorney General feels the rule should stay at semiannually even though CGAND is proposing annual reconciliations. Chairman Wang indicated that cost was a major factor for the request to reduce the number of reconciliations to annual. Commission Altenburg moved that all reconciliations of inventories/master records be performed on an annual basis rather than semiannually. Commissioner Krabseth seconded the motion. The motion passed 3-2. Although the Commission approved the change from semiannual to annual they voiced some concerns that the industry must act responsibly in this area.

Appreciates Changes to Allow Distinctive Identifiable Features for Differently Priced Packages  
Item 6 - NDAC 99-01.3-04-03(7)

No action required by the Commission based on the comment made at the public hearing.

Agrees with Change to Allow Organizations to Use a Radio Frequency Signal to Update Cards

Item 7 – NDAC 99-01.3-04-03(11)(j)

No action required by the Commission based on the comment made at the public hearing.

Appreciates Option of Primary Color as an Additional Receipting Method for Bingo

Item 8 – NDAC 99-01.3-04-03(27)

No action required by the Commission based on the comment made at the public hearing.

Asked that the AG's Office Review the Payment of Bingo Prizes in Excess of Gross

Item 9 – NDAC 99-01.3-04-03(28)

Mr. Lauer explained that the current rule does not allow an organization to continue bingo at a site in which the bingo prizes exceeded the bingo gross proceeds for two consecutive quarters. Chairman Wang asked members of the Advisory Board to explain why organizations desired a change to allow the Attorney General's Office the discretion to allow bingo to continue at a site beyond the two consecutive quarters. Discussion followed. Commissioner Frenzel moved that the current rule not be changed but granted the Attorney General's Office the authority to waive the rule after review on a case-by-case basis. The motion was seconded by Commissioner Krabseth. The motion passed 5-0. Based on current authority in NDAC 99-01.3-02-03(10) no rule change is necessary.

Advisory Board Member Mr. Ken Lien asked the Commission to revisit item # 7 regarding the use of a radio frequency signal to daub bingo cards. Commissioner Frenzel also expressed her concern with this rule change. Discussion followed. After several specific questions on use of radio frequency signals from Commissioners and distributors represented at the meeting it was decided that no serious concerns existed.

Request for Site Specific Use of Dealers Taking a Hit Card on a "Soft 17"

Item 10 – NDAC 99-01.3-08-02(1) & 99-01.3-08-11(10)(g)

Mr. Lauer explained that limited changes were necessary based on action taken by the Commission during the last rule making process in which the option of a dealer taking a hit card on a "Soft 17" was allowed. Although use of this option has been very limited, the organizations are now requesting that this option be allowed at one or more individual sites. It was reported that all Indian casinos in North Dakota currently use this option. Commissioner Frenzel moved that the language be changed to allow organizations by site to adopt this option. Commissioner Axtman seconded the motion. The motion passed 5-0.

Comment Concerning Specifications for Super VHS YC or Coaxial Video Cable

Item 11 – NDAC 99-01.3-08-04(1)(e)

Mr. Lauer explained that this language was originally developed with input from vendors of video surveillance equipment. Therefore, although the language is very specific the vendors considered it necessary when the rule was established. Critics of this section indicate that neither they nor the AG's office can assure compliance but rely on the vendors of video surveillance to insure compliance. Discussion followed. Commissioner Frenzel moved that the Office of Attorney General review this section of the rules during the upcoming year and provide suggestions for eliminating unnecessary language. Commissioner Altenburg seconded the

motion. Commissioner Krabseth asked that the motion be amended to state that during the next rule making process this section be reviewed by the AG's office. Commissioner Frenzel seconded the amendment to her original motion. The amended motion passes 5-0.

*Conflicting Comments Received on Video Surveillance Review Requirements*

Item 12 – 99-01.3-08-04(8)

Mr. Lauer explained that conflicting comments were received on the proposed rule change that no longer requires one-half hour or one hour of video surveillance review per week multiplied by the number of tables at a site. The CGAND board also requested that on a monthly basis that an independent person is required to confirm that the video surveillance equipment is properly functioning. Discussion followed with the Commission deciding that no additional changes were necessary.

*Request that an Organization's Employees be Allowed to Install Video Surveillance Equipment*

Item 13 – 99-01.3-08-04

Chairman Wang suggested that based on the Commission's decision on Item 11 that this should be looked at during the next rule making process. Advisory Board Member Voller pointed out that all contractors performing work in a bar are required to have a contractor's license from the Secretary of State.

*Support for Use of Automatic Card Shuffling Devices*

Item 14 – 99-01.3-08-08(1)

Mr. Lauer explained that this comment was in support of using automatic card shuffling devices. The specifications of the card shuffling devices are included in the manufacturing chapter under 99-01.3-16-09.3.

*Requested Several Changes to Dealing Procedures*

Item 15 & 16 – 99-01.3-08-09(3)-(4) & 99-01.3-08-09(6)

Mr. Lauer pointed out that some of the requested language changes were unnecessary based on the permissive language in the rules. Conflicting comments were also received related to tip betting. The CGAND board voted to not support the tip betting changes requested. The Commission agreed that no changes were necessary with the proposed rule changes.

*Conflicting Comments on Tip Betting Procedures*

Item 17 – 99-01.3-08-11(1)

Mr. Lauer briefly explained the conflicting comments. Based on limited support from the industry on tip betting procedures no change was enacted.

*Request to Allow an Organization to Establish its Own Payoff Procedures on Twenty-one*

Item 18 – 99-01.3-08-11(1), (10), (12), (13), & (14)

Mr. Lauer explained the request that organizations be allowed to establish its own payoff procedures provided that the twenty-one table has video surveillance and that alternate policies have been adopted by the organization. Discussion followed. Chairman Wang indicated his

desire that this be done on a case-by-case basis through waivers from the AG's Office if the request has merit.

*Requested Change from a Security Company to a Security Agency*

Item 19 – 99-01.3-08-14(2) & 99-01.3-02-11(8)

This request was made by Steven Gaber owner of Sentry Security, Inc. who was present at the meeting to voice his concerns with the licensing of security agencies and no licensing requirements for security companies. Discussion followed. Commissioner Krabseth moved that security agency be added to the existing language which currently states security company. The motion was seconded by Commissioner Altenburg. Motion passed 5-0.

*Comment Against the Proposed Increase in Per Diem Rate for Color or Honor Guards*

Item 20 – 99-01.3-14-02(10)(a)

Mr. Lauer explained that increasing the per diem rate for Color and Honor Guards to that of the Armed Services Ready Reserve would increase the maximum reimbursement rate from \$20 to \$50. Commissioner Frenzel pointed out that this would be a maximum amount but that organizations could pay less. The commission decided that no change was necessary.

*Comment on Allowing New Technology to be Used with Required Recordkeeping*

Item 21 – 99-01.3-12-02(6)

Mr. Lauer pointed out that standard recordkeeping forms are only required for three game types (Twenty-one with video surveillance, pull tab dispensing devices, and paddlewheels with a table). Commissioner Altenburg moved that language similar to the twenty-one chapter be placed in the pull tab dispensing device chapter. The motion was seconded by Commissioner Axtman. The motion passed 5-0.

Mr. Lauer asked that the Commission give final approval to the amended administrative rules. Commission Axtman moved that all administrative rules as printed, presented, and changed be approved. The motion was seconded by Commissioner Altenburg. The motion passed 5-0.

Chairman Wang asked with support from the entire Commission that the AG's Office begin working with the organization to expedite the use of debit cards as a form of payment for games of chance.

**Other Issues for Discussion**

*Letter of Sentry Security, Inc.*

Mr. Lauer directed the Commission to a May 31, 2006, letter from Sentry Security, Inc. for an interpretation of the rules as they relate to independent contractors. Mr. Gaber presented information on his company's structure. Commissioner Altenburg moved and Commissioner Krabeth seconded a motion that independent contractors not be restricted from the supervisor/subordinate relationship and may be common household members. The motion passed 5-0.

### Demonstration of Electronic Bonanza Bingo

The Commission was given a demonstration of Planet Bingo's QuickPlay Bingo game and Digital Game Media's BounceBack Bingo game which are electronic versions of bonanza bingo. Organizations asked for a test study for use of this new bingo game. Discussion followed. Commissioner Altenburg moved that bingo halls be allowed a 6-month trial of the electronic bonanza bingo. The motion was seconded by Commissioner Krabseth. Based on discussion, Commissioner Altenburg attempted to amend her original motion that all organizations be allowed one site in which to test the electronic bonanza bingo. The amendment failed due to lack of a second. A vote on the original motion failed 2-3. Although the Commission was receptive to the gaming organizations need for new products they express a concern that this game would be an expansion of the game bingo without legislative approval.

### Request for Prize Boards through a Dispensing Device

Mr. Lauer shared a request from three distributors that are interested in conducting prize boards through dispensing devices. The legislature authorized the Attorney General to allow limited assistance by alcoholic beverage establishments in the conduct of prize boards. The only waiver needed at this time would be to disconnect the random generator from the dispensing device columns. Mr. Lauer indicated that this could be done on a temporary basis during a test period to insure that no unforeseen problems arise. Commissioner Altenburg moved that the Attorney General's office grant temporary waivers to allow the modification of current dispensing devices. The motion was seconded by Commission Krabseth. The motion passed 5-0.

### Adjournment

Chairperson Wang adjourned the meeting at approximately 5:00 p.m.

Mr. Lauer prepared the minutes.

Attachments



**NOTICE OF MEETING  
ACCESS TO PUBLIC RECORDS**  
SECRETARY OF STATE  
SFN 51392 (10-01)

Secretary of State  
State of North Dakota  
600 E Boulevard Ave Dept 108  
Bismarck ND 58505-0500  
Telephone 701-328-3665  
Toll Free 800-352-0867  
Fax 701-328-1690

Agency/Organization Name <b>STATE GAMING COMMISSION</b>		Date <b>6/26/06</b>	
Address <b>c/o Office of Attorney General 600 E Boulevard Ave</b>		City <b>Bismarck</b>	Telephone # <b>701-328-4848</b>
Contact Person <b>Keith Lauer, Gaming Division</b>		State <b>ND</b>	Zip Code + 4 <b>58505-0040</b>
		Telephone # <b>701-328-3234</b>	

The attached information is being submitted according to North Dakota Century Code, Chapter 44-04.  
Check one of the following:

- ☐ North Dakota Century Code, Section 44-04-18(1)

The above named agency does not have an office and is providing the name and telephone number of a contact person who can provide access to its public records.

- ☐ North Dakota Century Code, Section 44-04-20(3)

The above named agency is filing their January annual schedule of regular meetings that are planned to be held throughout the year. Filing the schedule is not a substitute for filing a separate notice for each meeting on the schedule.

- ☒ North Dakota Century Code, Section 44-04-20(4)

The above named agency is filing a notice of an upcoming meeting. We are filing this notice at the same time the members of our governing body are being informed.

- ☐ North Dakota Century Code, Section 44-04-20(4)

The above named agency is filing a notice of a meeting to reflect a change in date or location from previously filed notices. We are filing this notice at the same time the members of our governing body are being informed.

Each entity that files notices with the Secretary of State's Office is individually responsible for filing the pertinent information as required by North Dakota Century Code, Chapter 44-04. The Secretary of State's Office is only the filing office and cannot answer specific questions regarding the information that must be included with the filing. For guidance, entities should read North Dakota Century Code, Chapter 44-04, check with their legal counsel, or refer to the Open Records and Meetings Manual prepared by the Office of the Attorney General.

Here are a few of the guidelines from the Open Records and Meetings Manual. All meeting notices, including executive sessions, must contain the following information: date, time, and location; topics to be considered where such listing is practicable (for example, not with the annual filing of regularly scheduled meetings) (note: topics discussed at an emergency or special meeting are limited to those included in the notice); general subject matter of any executive session expected to be held during the meeting; telephone or video conferences must include the location of the speaker phone or monitor; a telephone number for arranging special accommodations.



Wayne Stenehjem  
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**MEMO**

**TO:** Gaming Advisory Board  
State Gaming Commission

**FROM:** Keith G. Lauer, Director, Gaming Division *KL*

**RE:** Transmittal - Public Comments on Proposed Gaming Rules  
Joint Meeting of the Gaming Advisory Board and State  
Gaming Commission

**DATE:** June 26, 2006

Enclosed are the following items of information for the **Thursday, July 13, 2006**, meetings of the Advisory Board and State Gaming Commission:

1. For the Advisory Board and Gaming Commission's meeting – current copy of the proposed administrative rules and a document titled "Public Comments on Proposed Gaming Rules." Oral and written comments or questions were expressed on twenty-one different issues. There were four separate written comments that are also enclosed. Additionally, our office received two written comments after the December 30, 2005, comment period which are also enclosed;
2. For the Gaming Commission's consideration – "draft minutes" of the Commission's November 9, 2005, meeting; and
3. A request from John Klava of Bingo Top Bingo for consideration of a Quick Shot Bonanza Bingo game.

The designated room in the capitol complex for the Advisory Board and Gaming Commission meeting is as follows:

The joint Advisory Board and Gaming Commission meeting will be held from 1:00 - 5:00 p.m. in the Fort Totten Room on the ground floor of the capitol.

I look forward to meeting with you on July 13, 2006.

If you have a question, please call me at 1-800-326-9240 or 328-4848.

Enclosures



STATE GAMING COMMISSION  
c/o Office of Attorney General  
600 E. Boulevard Ave., Dept.125  
Bismarck, ND 58505-0040

Public Comments on Proposed Gaming Rules  
July 13, 2006

LIST OF WRITTEN COMMENTS (ATTACHED) AND SUMMARY OF VERBAL PUBLIC COMMENTS ON PROPOSED NEW RULES, AMENDMENTS, AND REPEAL OF RULES RELATED TO NORTH DAKOTA ADMINISTRATIVE CODE ARTICLE 99-01.3, GAMES OF CHANCE ADMINISTRATIVE RULES.

**Notification and Conduct of Public Hearings**

1. Notification was sent to the North Dakota Newspaper Association for publication in the 52 county newspapers during the week of November 17-23, 2005.
2. Notifications were mailed to distributors, organizations, manufacturers, vendors of video surveillance equipment, and members of the Gaming Advisory Board and Gaming Commission in the December 2005 Edition of the Gaming Update newsletter which was mailed on December 7, 2005.
3. The Office of Attorney General conducted three public hearings for the State Gaming Commission as follows:

<u>Date</u>	<u>City</u>	<u>Attendance</u>
December 14, 2005	Bismarck	4
December 15, 2005	Fargo	30
December 16, 2005	Grand Forks	15

**Written Comments**

1. North Dakota Association for the Disabled, Inc. – Summary of Proposed Changes (no specific date listed on the letter received at the December 14, 2005 hearing)
2. Red River Human Services Foundation – December 15, 2005 letter
3. Charitable Gaming Association of ND (CGAND) Board – December 20, 2005 letter
4. Prairie Public Broadcasting, Inc. – December 27, 2005 letter

**Legend to Status – Decision by the Gaming Commission at its Meeting of July 13, 2006**

- A – The proposed new rule, amendment, or repealed rule was adopted without major change.
- C – The proposed new rule, amendment, or repeal was partially changed by compromise or clarification.
- N – The proposed new rule, amendment, or repealed rule was not adopted or the rule was deleted.
- N/A – The comment, such as a question or remark, was not expressed to change a proposed new rule, amendment, or repealed rule, or the comment is moot because of other action taken on that or a related rule.

## Public Comments

### Chapter 99-01.3-02 – General Rules

<u>Number</u>	<u>Page</u>	<u>Citation</u>	<u>Comment</u>	<u>Status</u>
1.	11 & 15	99-01.3-02-05(3) & 99-01.3-02-11	Should additional restrictions be placed on lessor's employees? Restrict them from conducting independent contractor services.	N/A
2.	14	99-01.3-02-08(1)	Requested that organizations be allowed the option to accept debit cards in addition to cash and checks. (19 out of 30 attending the hearing in Fargo liked the idea) See letters #3 and #4 supporting this suggestion.	C
3.	15	99-01.3-02-11(8)	Question – Should the reference to a security company be changed back to security agency?	C

### Chapter 99-01.3-03 – Accounting Rules

4.	17	99-01.3-03-01(2)	Requested that the sentence "If the attorney general determines that a system of internal control is inadequate, an organization shall address the inadequacy." be deleted. Add language stating that "A gaming organization must follow all North Dakota Century Code and Administrative rules. In addition, each gaming organization must develop an internal control manual that is consistent with Generally Accepted Accounting Principles and is duly adopted by their Board of Directors." See letter #2. CGAND Board agrees with current version which changes "remedy" to "address". See letter #3.	A
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|----|----|----------------------|--|---|
| 5. | 25 | 99-01.3-03-09(1)-(5) | <p>1. Agrees with change from quarterly to semiannual reconciliations and allowing inventory of bingo cards by primary color or serial number rather than requiring both.</p> <p>2. Would rather see annual rather than semiannual reconciliations. Fargo 12 out of 30 preferred annual. Grand Forks 8 out of 15 preferred annual. CGAND Board agrees with this suggestion. See letter #3.</p> | C |
|----|----|----------------------|--|---|

**Chapter 99-01.3-04 – Bingo**

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|----|----|----------------------|--|---|
| 6. | 32 | 99-01.3-04-03(7)     | Appreciates the change to allow a distinctive identifiable feature as an additional method when an organization sells two or more differently priced bingo cards or packages.  | A |
| 7. | 34 | 99-01.3-04-03(11)(j) | Agrees with the change to allow an organization the option to use a radio frequency signal to mark numbers on a bingo card marking device.   | A |
| 8. | 37 | 99-01.3-04-03(27)    | Appreciates the new receipting method for bingo which allows the option of referencing either primary color or serial number.  | A |
| 9. | 37 | 99-01.3-04-03(28)    | Requested that the AG's office have the opportunity to review and possibly allow bingo activity to continue at sites in which the bingo prizes exceeded total bingo gross proceeds for two consecutive quarters. CGAND Board agrees with this suggestion. See letter #3. | N |

**Chapter 99-01.3-08 – Twenty-One**

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|-----|----|---------------------|--|---|
| 10. | 58 | 99-01.3-08-02(1)    | Request that the statement "If an organization allows the dealer to take a hit card when the dealer has a soft 17" be changed to "If <u>a site</u> allows the dealer to take a hit card when the dealer has a soft 17". A similar change would also be needed in subsection g of section 99-01.3-08-11(10) on page 71. This would allow an organization a variety of dealing options by site. See letters #1 and #4. | C |
| 11. | 61 | 99-01.3-08-04(1)(e) | Comment concerning the specifications regarding super VHS YC or coaxial video cable outlined in this subsection.   | N |

12.	62	99-01.3-08-04(8)	Several conflicting comments from likes the changes (see letter #4) to a concern that no video surveillance review is required by the rules (verbal comment). Concern expressed with the message this is sending to an organization's employees when no video surveillance review is required. Comment that independent contactors should also be allowed to review and document the daily table review. General comments regarding internet access of video and live video review. Additional request from CGAND Board that the rules state "Each month, a person who is independent of the conduct of games at a site, shall complete and document a review confirming that a site has a properly functioning video surveillance system". See letter #3.	A
13.	63	99-01.3-08-04(10)	Requested that an organization's employees be allowed to install video surveillance equipment provided that it is approved by the AG's office.	N
14.	66	99-01.3-08-08(1)	Supports the option to use automatic card shuffling devices. See letter #4.	A
15.	67	99-01.3-08-09(3)-(4)	Requested several changes related to splitting pairs or any two 10-count cards, maximum number of hands per betting space, and doubling-down on the first two cards dealt. See letter #1.	N
16.	67	99-01.3-08-09(6)	Conflicting comments on allowing additional tip bets on split hands. See letter #1 for support of a change. Another verbal comment disagreed with this requested change. Additional comment requesting that tip bets not exceed the original bet made by a player.	A
17.	68.	99-01.3-08-11(1)	Conflicting comments on a request to allow even money to be taken on a tip bet at a players option when the player has a natural twenty-one and desires to make an insurance bet and the organization's option is to do even money payoffs rather than allowing an insurance bet. Currently the tip bet in this situation is a standoff (push).	N
18.	68-71	99-01.3-08-11(1), (10), (12), (13), &(14)	Request to allow an organization to establish its own payoff procedures	N

19.	76	99-01.3-08-14(2)	<p>provided that the twenty-one table has video surveillance and the organization has adopted an alternate policy.</p> <p>Requested change from reference of a security company on line 4 to a security agency.</p>	C
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**Chapter 99-01.3-14 – Eligible Uses**

20.	106	99-01.3-14-02(10)(a)	<p>Comment against the proposed increase in the per diem rate for color or honor guard members. Should be no more than \$25 maximum to keep the color and honor guard members volunteering rather than a job to supplement the member's income.</p>	A
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**General Comment**

21.	91	99-01.3-12-02(6)	<p>Allow technology to be used when standard recordkeeping forms are required by the rules. AG note: Currently 3 game types require the use of standard recordkeeping forms. These games include twenty-one, if video surveillance is required, pull tab dispensing devices, and paddlewheels with a table.</p>	C
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